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14 *Attorneys for Plaintiffs Adina Ringler,
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17 **UNITED STATES DISTRICT COURT
18 CENTRAL DISTRICT OF CALIFORNIA**

19 ADINA RINGLER, KRISTA ROBLES,
20 JAY SMITH, and JANA RABINOWITZ,
21 individually and on behalf of all others
22 similarly situated,

23 Plaintiffs,

24 v.

25 THE J.M. SMUCKER COMPANY,

26 Defendant.

27 Case No. 2:25-cv-01138-AH-E

28 Hon. Anne Hwang

29 **STIPULATION TO MODIFY
30 SCHEDULING ORDER**

31 Complaint filed: February 10, 2025

32 Current Trial Date: August 4, 2026

1 **TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF**
2 **RECORD:**

3 Plaintiffs Adina Ringler, Krista Robles, Jay Smith, and Jana Rabinowitz
4 (“Plaintiffs”) and Defendant The J.M. Smucker Company (“Smucker” and
5 collectively, the “Parties”) by and through their undersigned counsel of record, hereby
6 agree and stipulate to modify the Court’s July 31, 2025, Civil Pretrial Schedule and
7 Trial Order (ECF No. 38, the “Scheduling Order”) for the reasons stated below.

8 **WHEREAS**, this Stipulation is accompanied by a declaration from Plaintiffs’
9 counsel setting forth the specific reasons for the requested continuance as required by
10 the Court’s Standing Order (ECF No. 12 at ¶ 3). Defendant will file a declaration from
11 its counsel following the filing of this Stipulation;

12 **WHEREAS**, on July 31, 2025, the Court entered the Scheduling Order in the
13 above-captioned action (the “Action”) (ECF No. 38 at 3);

14 **WHEREAS**, on October 29, 2025, the Court held a hearing and advised counsel
15 to meet and confer regarding modification of the Scheduling Order and noted during
16 the hearing that the Court would grant a reasonable modification to the Scheduling
17 Order, including a briefing schedule for Plaintiffs’ forthcoming motion for class
18 certification (*see* ECF No. 62);

19 **WHEREAS**, pursuant to Civil Local Rule 7-3, the Parties met and conferred
20 regarding modification of the Scheduling Order and agreed on an extension of
21 deadlines to allow the Parties to respond to additional discovery requests, meet and
22 confer on the ongoing discovery disputes, produce documents in accordance with the
23 agreed upon scope of discovery, and prepare for and conduct Fed. R. Civ. P. 30(b)(6)
24 depositions and percipient witness depositions;

25 **WHEREAS**, the Parties further acknowledge that additional time is needed to
26 retain and consult with experts in connection with class certification issues, including
27 experts in consumer perception, marketing, and labeling, who require access to
28 relevant discovery materials;

1 **WHEREAS**, to date, Defendant has been working on collecting documents for
 2 production, has produced, among other things, product labels, and documentation
 3 relating to the supplier of the citric acid used in the Products at issue, and is in the
 4 process of making additional productions of responsive, non-privileged documents;

5 **WHEREAS**, the Parties have not previously requested the Court to modify the
 6 Scheduling Order through stipulation;

7 **WHEREAS**, under Fed. R. Civ. P. 6(b)(1)(A), “the court may, for good cause,
 8 extend the time with or without motion or notice if the court acts, or if a request is
 9 made, before the original time or its extension expires”; and

10 **WHEREAS**, for the reasons stated above, as detailed in the concurrently filed
 11 declarations from counsel for the Parties, good cause exists for the Court to grant this
 12 Stipulation.

13 **NOW THEREFORE, THE PARTIES HEREBY AGREE AND**
 14 **STIPULATE AND JOINTLY REQUEST THE FOLLOWING¹:**

Trial and Pretrial Dates	Original Deadline	Defendant's Proposed Dates	Plaintiffs' Proposed Dates	Stipulated Deadline
Jury Trial <u>Note:</u> Any requests for additional trial days must be made at the time of the deadline for Trial Filings (First Round). The Court will make a final determination on the days needed for trial at the FPTC.	August 4, 2026 [Tuesday] at 8:30 a.m.	Agreed	Agreed	May 4, 2027
Final Pretrial Conference [L.R. 16], Hearing on Motions <i>in Limine</i>	July 15, 2026	Agreed	Agreed	April 14, 2027

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 28 ¹ See Declaration of Ronald Y. Rothstein (explaining basis for Defendant's proposed schedule).

1	<u>Note:</u> All hearings shall be on Wednesdays at 1:30 p.m. By default, all hearings shall proceed in person, unless a request is made by the parties.			
5	Last Date to <u>Hear</u> Motion to Amend Pleadings or Add Parties [Wednesday]	September 17, 2025	N/A	N/A
8	Class Certification Motion Deadline	November 12, 2025	And Deadline to Complete Any Expert Reports Upon Which Plaintiffs Rely in Their Motion March 25, 2026	March 25, 2026
16	Fact Discovery Cutoff <u>Note:</u> Any motions to compel must be filed and heard before the discovery cutoff.	March 11, 2026	February 23, 2026	December 9, 2026
20	[Defendant's Requested Event] -- Opposition to Class Certification Motion Deadline, Deadline to Complete Any Expert Reports Upon Which Defendant Relies in Its Motion, and Deadline to File Any <i>Daubert Motions</i> ² as to Plaintiffs' Experts	N/A	July 8, 2026	Per Code
28				

1	[Defendant's Requested Event] --Deadline to Complete Depositions and Document Productions for Plaintiffs' Experts Re Class Certification	N/A	July 8, 2026	<i>See Expert Discovery Cutoff Date</i>	Could Not Agree
2	[Defendant's Requested Event] -- Reply in Support of Class Certification Motion Deadline, Deadline to Complete Any Rebuttal Expert Reports Upon Which Plaintiffs' Rely in Their Motion, and Deadline to File Any <i>Daubert</i> Motions as to Defendant's Experts	N/A	August 7, 2026	Per Code	Could Not Agree
3	[Defendant's Requested Event] --Deadline to Complete Depositions and Document Productions for Defendant's Experts Re Class Certification	N/A	August 7, 2026	<i>See Expert Discovery Cutoff Date</i>	Could Not Agree
4	Expert Disclosure (Initial)	March 25, 2026		Sept. 9, 2026	Could Not Agree
5	Expert Disclosure (Rebuttal)	April 8, 2026		Oct. 7, 2026	Could Not Agree
6	Expert Discovery Cutoff	April 15, 2026	Aug. 7, 2026	Dec. 9, 2026	Could Not Agree
7	Last Date to Hear Motions [Wednesday]	April 22, 2026	Agreed	Agreed	January 20, 2027

1	Deadline to Complete Settlement Conference via Private Mediation [L.R. 16-15]	June 10, 2026	Agreed	Agreed	March 10, 2027
2	3	4	5	6	7
8	9	10	11	12	13
14	15	16	17	18	19
20	21	22	23	24	25
26	27	28	29	30	31

1	<ul style="list-style-type: none">• Joint Proposed Final Pretrial Conference Order [L.R. 16-7]• Joint Agreed Upon Proposed Jury Instructions (jury trial only)• Disputed Proposed Jury Instructions (jury trial only)• Joint Proposed Verdict Forms (jury trial only)• Joint Proposed Statement of the Case (jury trial only)• Proposed Voir Dire Questions, if any (jury trial only)• Evidentiary Objections to Declarations of Direct Testimony (bench trial only)• Table of challenged exhibits• Deposition designations as to which the parties have any dispute or objection			
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23 **IT IS SO STIPULATED AND AGREED.**

24 Dated: November 7, 2025

25 CROSNER LEGAL, P.C.

26 By: /s/ Craig W. Straub
27 Craig W. Straub
28 Lilach H. Klein
Michael T. Houchin

Zachary M. Crosner

*Attorneys for Plaintiffs Adina Ringler,
Krista Robles, Jay Smith, and Jana
Rabinowitz*

Dated: November 7, 2025

WINSTON & STRAWN LLP

By: /s/ Ronald Y. Rothstein
Ronald Y. Rothstein (*pro hac vice*)
Jared R. Kessler (*pro hac vice*)
Shawn R. Obi

*Attorneys for Defendant
The J.M. Smucker Company*

ATTESTATION

Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filer attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content, and have authorized the filing.

Dated: November 7, 2025 CROSNER LEGAL, P.C.

By: /s/ Craig W. Straub
Craig W. Straub

*Attorneys for Plaintiffs Adina Ringler,
Krista Robles, Jay Smith, and Jana
Rabinowitz*